

TUCKER LEVIN, PLLC

230 PARK AVENUE, SUITE 440

NEW YORK, NEW YORK 10169

212-330-7626

FACSIMILE: 212-422-3305

DUNCAN P. LEVIN  
DIRECT DIAL: 646-445-7825  
DLEVIN@TUCKERLEVIN.COM

October 9, 2020

ELECTRONICALLY FILED

Hon. Nicholas G. Garaufis  
Senior United States District Judge  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11215

Re: U.S. v. Christopher Chierchio, et al.  
20-Crim.-306 (NGG)

Dear Judge Garaufis:

This week, the government filed a forfeiture bill of particulars seeking forfeiture of certain property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1) and 982(b)(1), Title 21, United States Code Section 853(p), and Title 28, United States Code, Section 2461(c). *See* Docket No. 53. One of the seized bank accounts listed on the government's bill of particulars is associated with a client of this Firm, who may, as part of the ancillary forfeiture proceeding, submit an innocent owner claim. Furthermore, another unrelated client of the Firm earlier today received a subpoena duces tecum that is tangentially associated with the case. In an abundance of caution, given that one of the Court's clerks is related by marriage and because I formerly clerked for the Court, I respectfully write to disclose this. That being said, this Firm is not putting in a notice of appearance at this time. Both clients have waived any potential conflicts, and I have discussed this with Assistant U.S. Attorneys Lindsay Gerdes and Brian Morris, who have indicated that the government has no objections at this time.

Respectfully submitted,



Duncan P. Levin, Esq.  
(212) 330-7626

cc: All parties (via ECF)